

DUANE MORRIS LLP  
Gregory P. Gulia  
Christopher J. Rooney  
1540 Broadway  
New York, New York 10036-4086  
(212) 692-1000

Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

EVERT FRESH CORPORATION,

Plaintiff

v.

TV PRODUCTS USA, INC.  
KISHORE SAMTANI,  
NICK KURANI,  
ROHAN BELANI

Defendants

§ Civil Action No. 08-6461-CIV-BAER/KATZ

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NOTICE OF MOTION FOR  
ADMISSION PRO HAC VICE  
OF RICHARD T. REDANO

PLEASE TAKE NOTICE, that upon the annexed Declaration of Gregory P. Gulia on August 29, 2008, plaintiff Evert Fresh Corporation hereby moves this Court before the Honorable Harold Baer, Jr., at the United States District Court, 500 Pearl Street, New York 10007, for an order pursuant to Local Civil Rule 1.3(c) granting the admission *pro hac vice* of:

Richard T. Redano  
Duane Morris LLP  
3200 Southwest Freeway, Suite 3150  
Houston, TX 77027-7534  
Tel: (713) 402-3900  
Fax: (713) 402-3901  
[rtredano@duanemorris.com](mailto:rtredano@duanemorris.com)

to practice before this Court in the above-captioned action. Richard T. Redano is a member in good standing of the Bar of the State of Texas. There are no pending disciplinary proceedings against Richard T. Redano in any State or Federal court.

DUANE MORRIS LLP

By:

A handwritten signature in black ink, appearing to read 'G. P. Gulia', is written over a horizontal line.

Gregory P. Gulia  
1540 Broadway  
New York, NY 10036-4086  
Telephone: 212.692.1027  
Facsimile: 212.692.1020  
Attorneys for Plaintiff  
Evert Fresh Corporation

Dated: August 29, 2008

DUANE MORRIS LLP  
Gregory P. Gulia  
Christopher J. Rooney  
1540 Broadway  
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DECLARATION OF GREGORY P.  
GULIA IN SUPPORT OF MOTION  
FOR ADMISSION *PRO HAC VICE*  
OF RICHARD T. REDANO

GREGORY P. GULIA, under penalty of perjury, hereby declares:

1. I am a partner of the firm Duane Morris LLP, counsel for plaintiff EVERT FRESH CORPORATION in the above-captioned action. I am fully familiar with the facts contained herein. I submit this motion, pursuant to Local Civil Rule 1.3(c), for an order admitting *pro hac vice* Richard T. Redano to practice before this Court in the above-captioned action.

2. I am a member in good standing of the bar of the State of New York and am admitted to the bar of the United States District Court for the Southern District of New York. I am in good standing with this Court.

3. Richard T. Redano is a member in good standing of the State Bar of Texas. An original Certificate of Good Standing issued by the State Bar of Texas within the last thirty days is annexed as Exhibit A.

4. I have found Richard T. Redano to be a skilled attorney and a person of integrity. He is experienced in federal practice and is familiar with the Federal Rules of Civil Procedure.

5. Annexed as Exhibit B is a proposed order granting the admission of Richard T. Redano *pro hac vice*.

WHEREFORE, it is respectfully requested that this Court admit *pro hac vice* Richard T. Redano to practice before this Court in the above-captioned action.

I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: New York, New York  
August 29, 2008

  
GREGORY P. GULIA

# STATE BAR OF TEXAS



Office of the Chief Disciplinary Counsel

August 26, 2008

Re: Richard T. Redano, State Bar Number 16658400

To Whom It May Concern:

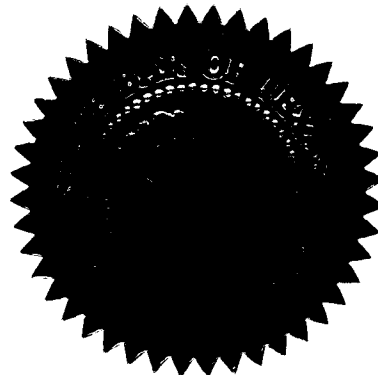
This is to certify that Mr. Richard T. Redano was licensed to practice law in Texas on November 8, 1985, and is an active member in good standing with the State Bar of Texas. "Good standing" means that the attorney is current on payment of Bar dues and attorney occupation tax; has met Minimum Continuing Legal Education requirements; and is not presently under either administrative or disciplinary suspension.

No previous disciplinary sanctions have been entered against Mr. Redano's law license.

Sincerely,

John A. Neal  
Chief Disciplinary Counsel

JN/ss



DUANE MORRIS LLP  
Gregory P. Gulia  
Christopher J. Rooney  
1540 Broadway  
New York, New York 10036-4086  
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Attorneys for Plaintiff

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§ Civil Action No. 08-6461-CIV-BAER/KATZ

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[PROPOSED] ORDER FOR  
ADMISSION *PRO HAC VICE*  
OF RICHARD T. REDANO

Upon consideration of the Motion of Gregory P. Gulia, attorney for plaintiff Evert Fresh Corporation, and said sponsor attorney's Declaration in Support thereof;

IT IS HEREBY ORDERED that

Richard T. Redano  
Duane Morris LLP  
3200 Southwest Freeway, Suite 3150  
Houston, TX 77027-7534  
Tel: (713) 402-3900  
Fax: (713) 402-3901  
[rtredano@duanemorris.com](mailto:rtredano@duanemorris.com)

is hereby admitted *pro hac vice* to practice before this Court in the above-captioned action.

SO ORDERED:

Dated: \_\_\_\_\_, 2008

\_\_\_\_\_  
Honorable Harold Baer, Jr.  
United States District Judge

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
EVERT FRESH CORPORATION

Plaintiff,

-against-

TV PRODUCTS USA, INC,  
KISHORE SAMTANI,  
NICK KURANI,  
ROHAN BELANI

Defendant.  
-----X

Civil Action No. 08 CV 6461  
(BAER) (KATZ)

**CERTIFICATE OF SERVICE**

I hereby certify that on August 29, 2008, a copy of Plaintiff Evert Fresh Corporation's Notice of Motion for Admission PRO HAC VICE of Richard T. Redano was served by mail upon the following party:

Brian J. Butler  
Bond, Schoeneck & King, PLLC  
1399 Franklin Avenue  
Suite 200  
Garden City, NY 11530

By: 

Edwin E. Grullon